

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) JOSHUA FIELDS	)	
	)	
Plaintiff,	)	
	)	
v.	)	21-cv-00986-G
	)	
(1) GREAT LAKES INSURANCE SE,	)	<i>Removed from the District Court of</i>
	)	<i>Kay County, State of</i>
(2) MJ KELLY COMPANY, and	)	<i>Oklahoma, Case No. CJ-2021-00037</i>
	)	
(3) CAPSTONE ISG,	)	
	)	
Defendants.	)	

**PLAINTIFF JOSHUA FIELDS' RESPONSES TO DEFENDANT  
GREAT LAKES INSURANCE SE'S FIRST REQUESTS FOR ADMISSION**

**REQUEST FOR ADMISSION NO. 1:** Admit you received a copy of the Policy from Great Lakes when it was issued.

**ANSWER TO REQUEST FOR ADMISSION NO. 1:** Plaintiff is unable to admit or deny this admission request because he does not have recollection of whether or not the policy was delivered to him. Plaintiff recalls there was an issue with Great Lakes incorrectly listing one of Plaintiff's insured properties as his mailing address rather than his home address. However, Plaintiff does not recall if that issue could have prevented him from getting a copy of the policy.

**REQUEST FOR ADMISSION NO. 2:** Admit that the terms of the Policy are not ambiguous.

**ANSWER TO REQUEST FOR ADMISSION NO. 2:** Denied.

**REQUEST FOR ADMISSION NO. 3:** Admit the Policy provides that as a condition of the insurance policy coverage you were required to maintain "fully-functioning Smoke detectors and Fire extinguishers as required by local code."

**ANSWER TO REQUEST FOR ADMISSION NO. 3:** Admitted.

**REQUEST FOR ADMISSION NO. 4:** Admit that the Policy obligated you to report the removal or impairment of any Fire Protective Safeguards, as that term is defined in the Policy, to Great Lakes.

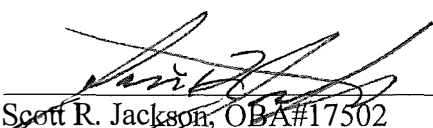
**ANSWER TO REQUEST FOR ADMISSION NO. 4:** Plaintiff admits that the Policy contained language that a payment of benefits under the policy may not happen for a loss caused by or resulting from a fire if, prior to the fire, Plaintiff knew of any suspension or impairment in any protective safeguard listed in the Schedule of the policy and failed to notify Defendant of that fact or failed to maintain in complete working order.

**REQUEST FOR ADMISSION NO. 5:** Admit you did not report to Great Lakes that you had removed the smoke detectors and fire extinguishers from the Building in February 2020.

**ANSWER TO REQUEST FOR ADMISSION NO. 5:** Plaintiff cannot admit or deny this admission request because he does not have recollection of whether or not he discussed this issue with Defendant or its agent.

Respectfully submitted,

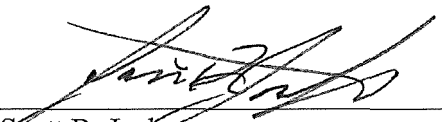
MARTIN, JEAN & JACKSON

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**CERTIFICATE OF MAILING**

I hereby certify that on this 6<sup>th</sup> day of April 2022, a true and correct copy of the above and foregoing instrument was placed in the U S Mail with proper postage affixed thereto to the following:

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Scott R. Jackson